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Counsel for Hamilton Chase – Santa Maria LLC

## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

IN RE:	)	Chapter 11
	)	
CIRCUIT CITY STORES, et al.	)	Case No. 08-35653-KRH
	)	Jointly Administered
Debtor	)	

## MOTION FOR ADMISSION PRO HAC VICE OF MARK SHINDERMAN

Gregory D. Grant (the "Movant"), a member in good standing with the bar of this Court, and a principal with the law firm of Shulman, Rogers, Gandal, Pordy & Ecker, P.A., hereby moves this Court to enter the proposed Order attached hereto permitting Mark Shinderman, an attorney with the law firm of Munger, Tolles & Olson, LLP., to appear *pro hac vice* before this Court in this Chapter 11 proceeding on behalf of Hamilton Chase – Santa Maria LLC. In support of this Motion, the Movant respectfully states as follows:

1. Mr. Shinderman is admitted to practice law in the State of California, and is a member in good standing of the bar of the United States Court of Appeals for the Ninth Circuit and the United States District and Bankruptcy Courts for the Northern, Central and Southern Districts of California. Mr. Shinderman has been practicing law since 1988. There are no disciplinary proceedings currently pending against Mr. Shinderman.

- 2. Movant requests that this Court admit Mr. Shinderman to the bar of this Court, *pro hac vice*, for the purpose of appearing as counsel for Hamilton Chase Santa Maria LLC in these jointly administered Chapter 11 proceedings.
- 3. Movant and his law firm will serve as co-counsel with Mr. Shinderman in these proceedings.
- 4. A copy of this Motion will be served upon all parties that are required to receive notice under the Order establishing Certain Notice, Case Management, and Administrative Procedures.
- 5. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, Movant requests waiver of the requirements that all motions be accompanied by written memoranda of law.

**WHEREFORE**, Movant respectfully requests that this Court enter an Order, substantially in the form attached hereto, (i) permitting Mark Shinderman to appear *pro hac vice* in this Chapter 11 case, and (ii) granting such other and further relief as may be appropriate and just.

Respectfully submitted,

/s/ Gregory D. Grant

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Counsel for Hamilton Chase – Santa Maria LLC

Dated: December 10, 2008

## **Certificate of Service**

I certify that on this 10th day of December 2008, the foregoing was filed and served using the Court's ECF system, and was sent by U.S. mail to the persons listed on the attached service list.

/s/ Gregory D. Grant

Gregory D. Grant (VSB No. 31784) Courtney R. Sydnor (VSB No. 45911) Shulman, Rogers, Gandal, Pordy & Ecker, P.A. 11921 Rockville Pike, Third Floor Rockville, Maryland 20852-2743 Telephone: (301) 230-5200 or

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## **Service List**

Circuit City Stores, LLC Attn: Reginald D. Hedgebeth 9950 Maryland Dr. Richmond, VA 23233

Commonwealth of VA State Corporation Commission Tyler Bldg. – 1300 E. Main St. Richmond, VA 23219

Corporate Sales & Use VA Dept. of Taxation 3600 West Broad St. Richmond, VA 23230-4915

Dept. of Justice – Civil Div. Attn: Dir., Civil Litigation Branch P.O. Box 875, Ben Franklin Station Washington, DC 20044

Environmental Protection Agency 1650 Arch Dt. Philadelphia, PA 19103-2029

Environmental Protection Agency 1200 Pennsylvania Ave., NW, #4209 Washington, DC 20004

Environmental Pro. Agency Office of General Counsel US EPSA Mail Code 2377R 1300 Pennsylvania Ave., NW Washington, DC 20004

Internal Revenue Service Attn: L. Lorello 400 N 8<sup>th</sup> St., Box 76 Richmond, VA 23219 Secretary of Commonwealth 1111 E. Broad St. 4<sup>th</sup> Floor Richmond, VA 23219

Office of the U.S. Trustee Attn: Robert B. VanArsdale 701 E. Broad St., #4304 Richmond, VA 23219

Office of the U.S. Trustee 600 E. Main St., #301 Richmond, VA 23219

Secretary of Treasury 15<sup>th</sup> & Pa. Avenue, NW Washington, DC 20020

Securities & Exchange Com. Attn: Bankruptcy Unit 15<sup>th</sup> & Pa. Ave., NW Washington, DC 20020

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Pasadena Independent School District Attn: Dexter D. Joyner 4701 Preston Avenue Pasadena, TX 77505